

RECEIVED MAY 10 2005

National Organic Standards Board c/o Arthur Neil
Room 4008-South Building
1400 and Independence Avenue-SW
Washington, DC, 20250-0001

Dear NOSB Chairman Jim Riddle,

I want to express full support for the recent Livestock Committee Pasture Requirement recommendations. Enforcement of true access to pasture is necessary so that all organic ruminants receive a significant portion of their total feed intake from pasture. *Lactation is not a "stage of production" during which dairy cows may be denied pasture for grazing!*

I further support these additional recommendations:

1. "Pasture" should be defined as (a) land managed to maintain or improve soil, water, and vegetative resources and (b) to provide maximum feed value by growing suitable grasses and other forages from which animals graze plant material still connected to its roots.
2. Organic dairy animals, from 12 months of age and up, must consume no less than 30% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three lactating dairy cows per acre.
3. Farms not in compliance with the above should be allowed one year to come into compliance but will need to file an updated and enforceable farm plan, providing for adequate pasture.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality on all organic dairy farms.

Sincerely,

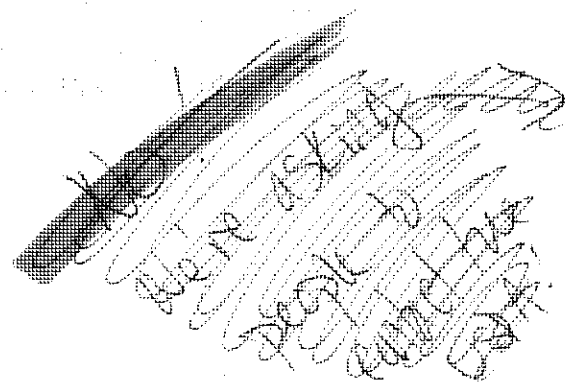

Paula Behr

4.29.05

Name and mailing address

Date

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ACTION ALERT! ACT NOW!

Say YES to Pasture for Organic Cows!

The Problem

On January 10, 2005, The Cornucopia Institute filed a formal complaint with the USDA's National Organic Program regarding standards for organic dairy production. At issue is whether it's legal to confine cows in a factory-farm setting, without access to pasture, and still label milk and dairy products as organic.

"It is our contention," says Mark Kastel of Cornucopia, "that you cannot milk 2000-6000 cows and offer them true access to pasture as required by the Organic Foods Production Act of 1990." The OFPA is the basis of the USDA's organic standards.

The Facts

Pasture, or grazing, is the cornerstone of organic dairy farming. Grazing protects the soil, creates wildlife habitat, and makes an ideal and all-natural water-filtration system.

Evidence suggests that milk from pastured cows is healthier than that confined-cow milk. The Danish Institute of Agricultural Research recently reported that organic milk is high in omega-3 fatty acids, and nearly 300% higher in antioxidants than conventional milk.

The Solution

Earlier this year, the National Organic Standards Board (NOSB) created a draft "guidance document" on pasture access for organic dairy farms. This document set minimum "benchmarks" that organic dairy farms should meet for the pasture requirement. **That document is now up for public input through May 20 and we need to flood the NOSB with comments to let them know that yes, organic shoppers *do* want to have minimum pasture benchmarks that are to be met by *all* organic dairy operations.**

What You Can Do

1. Please share this information with your circle of friends and colleagues.

2. **Contact the USDA.** A sample letter is on the back of this page. Personally written letters will carry more weight than form letters, but form letters are better than none!

Mail letters to:

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